

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:
LORDSTOWN MOTORS CORP., *et al.*,¹
Debtors.

Chapter 11
Case No. 23-10831 (MFW)
Jointly Administered
Re: Docket No. 82

CERTIFICATION OF COUNSEL SUBMITTING ORDER GRANTING KARMA AUTOMOTIVE LLC'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY

The undersigned counsel for Karma Automotive LLC (“**Karma**”) in the above-captioned matter hereby certifies as follows:

1. On July 5, 2023, Karma filed *Karma Automotive LLC's Motion for Relief from the Automatic Stay* [Docket No. 82] (the “**Motion**”).
2. On July 27, 2023, this Court held a hearing (the “**Hearing**”) on the relief requested in the Motion and to consider all responses filed thereto by the above-captioned debtors and debtors-in-possession (the “**Debtors**”), the Official Committee of Unsecured Creditors (the “**Committee** and collectively with Karma and the Debtors, the “**Parties**”)) and Karma [Docket 122, 128 and 144].
3. As set forth on the record at the Hearing, the Court granted the relief requested in the Motion. Following the Hearing and based upon the Court’s ruling on the record, the Parties conferred and have agreed upon the entry of a proposed form of order (the “**Proposed Order**”), attached hereto as **Exhibit A**.
4. The Proposed Order has been reviewed by and is acceptable to counsel for the counsel for the Debtors and the Committee.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.
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WHEREFORE, Karma respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: July 28, 2023
Wilmington, Delaware

Respectfully submitted,

CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman, Jr. _____

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